

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**(4) LUIS MENDEZ,
also known as (a.k.a.) Alex; a.k.a. 58**

Defendant.

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CRIMINAL NO. EP-10-CR-02213-KC

**GOVERNMENT'S MOTION TO DETAIN DEFENDANT
WITHOUT BOND AND MOTION FOR CONTINUANCE**

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas, and pursuant to 18 U.S.C. § 3142(e) and (f), files this, its Motion to Detain Defendant Without Bond and Motion for Continuance, and for cause, would respectfully show unto the Court the following:

1. The Defendant is charged with a violation of the Controlled Substances Act which carries a term of imprisonment of over ten (10) years.
2. The Defendant has been charged by Indictment with a violation of Title 18 United States Code, Section 1962(d), Conspiracy to Conduct the Affairs of an Enterprise through a Pattern of Racketeering Activity; Title 21 United States Code, Section 846, Conspiracy to Distribute and Possess with the Intent to Distribute Controlled Substances; Title 21 United States Code, Section 963, Conspiracy to Import Controlled Substances; Title 18 United States Code, Section 1956(h), Conspiracy to Launder Monetary Instruments; Title 18 United States Code, Section 956(a)(1) Conspiracy to Kill Persons in Foreign Country; Title 18 United States Code, Section 924 (c) and (j); Murder Resulting from the Use and Carrying of a

Firearm During and in Relations to Crimes of Violence and Drug Trafficking and Title 18 United States Code, Section 1959(a)(1), Murder in Aid of Racketeering Activity.

3. The Defendant is a foreign national, and, as such, presents a high risk of fleeing to avoid prosecution on this charge.
4. There are no conditions or combination of conditions which will reasonably assure the safety of the community should the Defendant be released on bond.
5. There are no conditions or combination of conditions which will reasonably assure the appearance of the Defendant at future court settings.

The Government would further move the Court for a three day continuance of the detention hearing from the date of the initial appearance.

WHEREFORE, premises considered, the Government respectfully prays the Court to hold the above-named Defendant without bail pending the final outcome of this case.

Respectfully submitted,

MARGARET F. LEACHMAN
ACTING UNITED STATES ATTORNEY

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